

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KAWADA CO., LTD.,)	
)	Case No.: 21-cv-2823
Plaintiff,)	
)	
)	Judge Robert M. Dow, Jr.
v.)	
)	
THE INDIVIDUALS, CORPORATIONS,)	
LIMITED LIABILITY COMPANIES,)	
PARTNERSHIPS AND UNINCORPORATED)	
ASSOCIATIONS IDENTIFIED)	
ON SCHEDULE A HERETO,)	
)	
Defendants.)	

**PLAINTIFF’S *EX PARTE* MOTION FOR ENTRY OF A TEMPORARY RESTRAINING
ORDER, INCLUDING A TEMPORARY INJUNCTION, A TEMPORARY TRANSFER
OF THE DEFENDANT DOMAIN NAMES, A TEMPORARY ASSET RESTRAINT,
EXPEDITED DISCOVERY, AND SERVICE OF PROCESS BY EMAIL AND/OR
ELECTRONIC PUBLICATION**

Plaintiff KAWADA CO., LTD., (“Plaintiff”) seeks entry of an *ex parte* temporary restraining order, including a temporary injunction against Defendants enjoining the manufacture, importation, distribution, offering for sale, and sale of Counterfeit KAWADA CO., LTD., Products, a temporary transfer of the Defendant Domain Names, a temporary asset restraint, expedited discovery, and service of process by email and/or electronic publication in an action arising out of 15 U.S.C. § 1114; Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); and the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510. A Memorandum of Law in Support is filed concurrently with this Motion.

Respectfully submitted,

Dated: May 26, 2021

By: s/Michael A. Hierl
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KAWADA CO., LTD.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on May 26, 2021.

s/Michael A. Hierl